

May 2, 2007

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12 St. SW
Washington, DC 20554

RE: Letter in Support of: Petition for
Rulemaking
By Martha Wright, et al. CC Docket No. 96-
128

Dear Ms. Dortch:

I am writing on behalf of Our Place, DC and Hope House, DC in support of the Petition for Rulemaking by Martha Wright, *et al.* CC Docket 96-128.

Our Place, DC

Our Place, DC's mission is to: **support women who are or have been in the criminal justice system by providing the resources they need to maintain connections with the community, resettle after incarceration, and reconcile with their families. Our Place helps women remain drug and alcohol free, obtain decent housing and jobs, gain access to education, secure resources for their children, and maintain physical and emotional health.**

Hope House, DC

Hope House, DC's mission is: **Hope House was founded to serve the needs of inmates who have been taken to prisons far from the district, and has three primary purposes: 1. To create programs that strengthen ties between District Inmates who are incarcerated in prisons outside the D.C. area and their families in Washington; 2. To advocate for and raise the level of awareness of the general public about inmates and their**

concerns; 3. To create programs for the children and families of D.C. prisoners.

Our Place, DC remains in contact with individuals while they are incarcerated through letters, telephone calls, and visits to the institutions. The telephone contact is made via collect calls paid for by the agency or through debit calls paid for by the prisoners. Consequently, Our Place DC regularly pays about \$800 a month in telephone bills. A great percentage of these monthly bills are for collect calls from prisoners in the DC Jail, the Correctional Treatment Facility and the Federal Bureau of Prisons. If the proposed benchmarks were embraced by the Federal Communications Commission (FCC), the phone bills of Our Place DC would be reduced by half and the organization would be able to provide increased services and resources for incarcerated and newly released women including assistance with housing, substance abuse treatment, obtaining benefits, reunifying with families, or with legal services, thereby reducing the likelihood that these individuals would re-offend.

As Hope House DC's mission is tied to helping inmates stay in touch with their families, they fully support the benchmark rates for collect and debit telephone calls. Many families struggle to pay for these calls and cannot afford to pay for them at all, as the prices are currently exorbitant. As a consequence, many inmates lose touch with their families while they are incarcerated. Thus, to support their mission of helping inmates strengthen ties to their families, Hope House DC concurs with the Petition.

Both organizations support benchmarks for collect telephone calls because the current excessive rates burden interstate commerce. In addition, the excessive rates: (1) unequally drain the economically disadvantaged; (2) prevent DC residents from receiving the same privileges and immunities as other state residents; (3) cause inmates to lose touch with their families and friends; and (4) preclude organizations,

such as Our Place, DC, from providing additional services to help prevent recidivism.

For similar reasons, Our Place, DC and Hope House, DC concurs with the request that debit calls be afforded to all inmates. Collect calls are drastically expensive. As stated in the Petition, an inmate can expect to pay approximately \$300 (p. 2) for an hour of conversation. Even with the benchmarks in place, the costs of collect calls are still more expensive than debit calls. Families often bear the burden of these expenses.

The benefit of providing debit telephone calls greatly outweighs the burden of providing the service. If access to debit calls is provided to inmates, and all telephone calls from inmates are reduced in cost, they will be more likely to stay in contact with their families and friends. The current telephone rates are a burden to the families, to friends, and ultimately to society, as many of these inmates will lose touch with their families and friends and become more likely to re-offend. It has been shown, as indicated in the Petitioner's Alternative Rulemaking Proposal (p 4), that inmates who stay in touch with family, friends and/or other support networks tend to re-offend at much lower rates than those who are isolated. Ultimately, society pays this expense, as the cost of housing one inmate for a year is approximately \$25,000.¹ Since it has been shown that individuals who have family contact are less likely to re-offend, the costs of providing lower telephone calls, both collect and debit, are far lower than bearing the burden of incarcerating individuals. Interstate commerce thereby is unduly burdened by the exorbitant prices of current telephone calls. Indeed the price of the commissions paid in exchange for providing telephone services to inmates is staggering when one contemplates the full cost.

¹ Piehl, A., Useem, B., & Dilulio Jr., J. "Right-Sizing Justice: A Cost-Benefit Analysis of Imprisonment in Three States". Center for Civic Innovation at the Manhattan Institute.8 (1999).

As it is, telephone companies have no financial interest in providing lower telephone rates to inmates. They receive extremely high commissions and there is currently no market competition. As such, the only feasible option is to provide acceptable benchmark rates for these services. Until a benchmark is set, society, families and inmates are in a quandary of how to deal with the prices of telephone calls from inmates. Our Place, DC and Hope House, DC will continue to provide services to DC prisoners; however, with fair benchmark rates in place for both collect calls and debit calls, and by providing debit calling to all inmates, Our Place, DC and Hope House, DC would be able to provide more services, more referrals, more help to strengthen ties between prisoners and their families and connect more inmates with the services that they need in order to prevent their return to prison.

It is with the above in mind, that Our Place, DC and Hope House, DC respectfully requests that the Federal Communications Commission grant the Petitioners' Alternative Rulemaking Proposal.

Sincerely,

/SG/

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/CF/

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